

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING
LITIGATION**

**Case No. 2:23-md-3080 (BRM)(LDW)
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI
JUDGE LEDA D. WETTRE**

Document Electronically Filed

THIS DOCUMENT RELATES TO ALL TRACKS AND CASES

NOTICE OF JOINT MOTION TO SEAL

PLEASE TAKE NOTICE on July 21, 2025, or a date and time to be set by the Court, Defendants OptumRx, Inc. (“OptumRx”); Evernorth Health, Inc., Express Scripts, Inc., Express Scripts Administrators, LLC, ESI Mail Pharmacy Service, Inc., Express Scripts Pharmacy, Inc., Medco Health Solutions, Inc., Ascent Health Services LLC, and The Cigna Group (“Express Scripts”); and CVS Health Corporation, Caremark Rx, L.L.C., CVS Pharmacy, Inc., Caremark Rx, L.L.C., CaremarkPCS Health, L.L.C., Caremark, L.L.C., and Zinc Health Services, L.L.C. (“CVS”) (together, “PBM Defendants”),¹ by and through their undersigned attorneys, shall move before the Honorable Leda D. Wettre, U.S.M.J., of the United

¹ For purposes of this motion, we refer collectively to all CVS, Express Scripts, and OptumRx affiliates and parent corporations listed above as the PBM Defendants, even though certain of those entities are not PBMs.

States District Court for the District of New Jersey, for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, sealing confidential material in the following documents that have been provisionally filed under seal:

- PBM Defendants' Opposition to Motion to Compel Responses to Compass Lexecon Subpoena to Produce Documents (the "Opposition") [ECF No. 596-597], pages 4 and 21; and,
- Exhibit 2 to the Opposition.

PLEASE TAKE FURTHER NOTICE that, in support of their Motion, the PBM Defendants will rely on the Declaration of Kelley Connolly Barnaby, the Declaration of Sophia A. Hansell, and the Index required by Local Civil Rule 5.3(c)(3) in the form suggested by Appendix U.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rules 5.3(c)(1) and 7.1(d)(4), no legal brief is required, and all relevant proposed findings of fact and conclusions of law have been set forth in the enclosed Proposed Order in accordance with Local Civil Rule 5.3(c)(3).

PLEASE TAKE FURTHER NOTICE that PBM Defendants have conferred with Plaintiffs and the Manufacturer Defendants and that no party objects to this motion.

PLEASE TAKE FURTHER NOTICE that an unredacted version of the Opposition and a redacted version of Exhibit 2 were filed under seal on May 30, 2025. An unredacted version of Exhibit 2 is filed under seal alongside this motion.

Dated this 27th day of June, 2025.

/s/ Kelley Connolly Barnaby

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